

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION
3 HON. MARTHA M. PACOLD,
4 DISTRICT JUDGE
5 HON. SUNIL R. HARJANI,
6 MAGISTRATE JUDGE
7 NO. 20 CV 2348

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10 ANTONIO SOLIS, JOSE SOLIS, AND JUAN RANGEL, INDIVIDUALLY
11 AND ON BEHALF OF ALL
12 OTHER SIMILARLY SITUATED,
13 Plaintiffs

14 V.

15
16 HILCO REDEVELOPMENT LLC, HRE CRAWFORD LLC, HRP EXCHANGE
17 55 LLC, MCM
18 MANAGEMENT CORP., CONTROLLED DEMOLITION, INC., AND
19 MARINE TECHNOLOGY
20 SOLUTIONS LLC,
21 Defendants

22 AND

23
24 JENKINS ENVIRONMENTAL SERVICES,
25 Third-Party Defendant

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30 DEPONENT: RAYMOND ZUKOWSKI
31 DATE: FEBRUARY 6, 2023
32 REPORTER: LINDSAY LARSON-TODD

1 the ground for.

2 Q But to your knowledge, they did soak the
3 ground?

4 A Yes, they had the water trucks running and the
5 DustBosses running.

6 Q Okay. So after the implosion, was the amount
7 of dust that was generated more than you expected?

8 A No, not at all.

9 Q Was it less than you inspect -- expected?

10 A It was exactly what I expected it to be.

11 Q And the dust generated from the implosion
12 migrated off-site, correct?

13 A Yes.

14 Q And are you aware of how far off-site the dust
15 migrated?

16 A No, I'm not.

17 Q Did you expect that dust would migrate
18 off-site after the chimney was demolished?

19 MR. DEVRIES: Objection. Asked and answered.

20 A Correct. Just it's all a function of which
21 way the wind's going to blow. Had the wind been out of
22 a different direction, it would've never went that way.
23 I didn't give it -- I honestly didn't give it any
24 thought. The perimeter was secure, and we proceeded with
25 the shot.